

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

H&R BLOCK, INC. and  
HRB INNOVATIONS, INC.

Plaintiffs,

v.

BLOCK, INC.

Defendant.

Case No. 4:21-cv-00913

**REBUTTAL DECLARATION OF ANTHONY J. DURONE IN SUPPORT OF  
PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR A PRELIMINARY  
INJUNCTION**

I, Anthony J. Durone, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of Missouri. I am a Partner in the law firm of Berkowitz Oliver LLP. I am over the age of 18 and competent to testify.

2. I submit this declaration in support of Plaintiffs' reply brief in support of the motion of H&R Block, Inc. and HRB Innovations, Inc. for a preliminary injunction against Defendant Block, Inc. in order to provide publicly-available evidence rebutting certain arguments made by Block, Inc. in opposition to the motion. This declaration is based on my personal knowledge, information, and belief.

**Money Transmitter Licenses**

3. The Nationwide Multistate Licensing System and Registry ("NMLS") allows state money transmitter licensees to submit certain changes to their NMLS record in advance of a desired effective date via the electronic NMLS system. A true and correct copy of a printout

from the NMLS Resource Center entitled “Advance Change Notice” is attached as **Exhibit 1**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/common/Pages/AdvanceChangeNotice.aspx>.

4. The NMLS provides guidance to money transmitters regarding advance notice or approval requirements before a legal name may be changed. *See id.*

5. The NMLS website indicates at least 20 states that do not impose any notice or approval requirement to change a money transmitter’s legal name, including:

a. Alabama. A true and correct copy of a printout of the NMLS’s Advance Change Notice Requirements Chart, sorted for (i) Agency “AL” and “AL-SC”, (ii) License Name “Money Transmitter License” and (iii) Legal Name Change, is attached as **Exhibit 2**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/common/Pages/AdvanceChangeNotice.aspx> at the “Advance Change Notice Requirements Chart” link;

b. Arizona. A true and correct copy of a printout of the NMLS’s AZ Money Transmitter License Checklist (Company) is attached as **Exhibit 3**, and can be accessed at

[https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/AZ\\_Money\\_Transmitter\\_License-Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/AZ_Money_Transmitter_License-Company-Amendment-Checklist.pdf);

c. Arkansas. A true and correct copy of a printout of the NMLS’s AR Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 4**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/AR-MONEY-TRANSMITTER-LICENSE-Amendment-Checklist.pdf>;

- d. Colorado. A true and correct copy of a printout of the NMLS's CO-DOB Money Transmitters License Amendment Checklist (Company) is attached as **Exhibit 5**, and can be accessed at [https://mortgage.nationwidelicensingsystem.org/slr/PublishedStateDocuments/MTL\\_Company-Amendment-Checklist\\_DOB\\_Draft.pdf](https://mortgage.nationwidelicensingsystem.org/slr/PublishedStateDocuments/MTL_Company-Amendment-Checklist_DOB_Draft.pdf);
- e. Illinois. A true and correct copy of a printout of the NMLS's IL Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 6**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/IL-Money-Transmitter-License-Company-Amendment-Checklist.pdf>;
- f. Indiana. A true and correct copy of a printout of the NMLS's IN-DFI Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 7**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/IN-DFI-Money-Transmitter-Company-Amendment-Checklist.pdf>;
- g. Minnesota. A true and correct copy of a printout of the NMLS's Minnesota Money Transmitter License Company Amendments, Agency Requirements document is attached as **Exhibit 8**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/MN-Money-Transmitter-Company-Amendment-Checklist.pdf>;
- h. Mississippi. A true and correct copy of a printout of the NMLS's MS Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 9**, and can be accessed at

[https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/MS\\_Money\\_Transmitter\\_License-Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/MS_Money_Transmitter_License-Company-Amendment-Checklist.pdf);

- i. Missouri. A true and correct copy of a printout of the NMLS's MO Sale of Checks and Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 10**, and can be accessed at [https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/MO\\_Sale\\_of\\_Checks\\_and\\_Money\\_Transmitter\\_License-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/MO_Sale_of_Checks_and_Money_Transmitter_License-Amendment-Checklist.pdf);
- j. Nebraska. A true and correct copy of a printout of the NMLS's Nebraska Money Transmitter License Company Amendments Agency Requirements is attached as **Exhibit 11**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NE-Money-Transmitter-License-Company-Amendment-Checklist.pdf>;
- k. Nevada. A true and correct copy of a printout of the NMLS's NV-FID Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 12**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NE-Money-Transmitter-License-Company-Amendment-Checklist.pdf>;
- l. North Dakota. A true and correct copy of a printout of the NMLS's ND Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 13**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/ND-Money-Transmitter-License-Company-Amendment-Checklist.pdf>;

- m. Ohio. A true and correct copy of a printout of the NMLS's OH Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 14** and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/OH-Money-Transmitter-Company-Amendment-Checklist.pdf>;
- n. Oregon. A true and correct copy of a printout of the NMLS's OR Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 15**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/OH-Money-Transmitter-Company-Amendment-Checklist.pdf>;
- o. Pennsylvania. A true and correct copy of a printout of the NMLS's Pennsylvania Money Transmitter Amendment Checklist (Company) is attached as **Exhibit 16**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/PA-MT-Amendment-Checklist.pdf>;
- p. Rhode Island. A true and correct copy of a printout of the NMLS's RI Currency Transmitter License Amendment Checklist (Company) is attached as **Exhibit 17**, and can be accessed at [https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/RI\\_Currency\\_Transmitter-Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/RI_Currency_Transmitter-Company-Amendment-Checklist.pdf);
- q. Tennessee. A true and correct copy of a printout of the NMLS's TN Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 18**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/TN-Money-Transmitter-Company-Amendment-Checklist.pdf>;

- r. Vermont. A true and correct copy of a printout of the NMLS's VT Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 19**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/VT-Money-Transmitter-License-Amendment-Checklist.pdf>;
  - s. Washington. A true and correct copy of a printout of the NMLS's WA Money Transmitter Amendment Checklist (Company) is attached as **Exhibit 20**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/WA-Money-Transmitter-Amendment-Checklist.pdf>; and
  - t. West Virginia. A true and correct copy of a printout of the NMLS's West Virginia Money Transmitter License Company Amendments Agency Requirements is attached as **Exhibit 21**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/WV-Money-Transmitter-License-Company-Amendment-Checklist.pdf>.
6. The NMLS website indicates 22 states that may impose some notice requirement to change a money transmitter's legal name, as follows:
- a. Georgia (5 days). A true and correct copy of a printout of the NMLS's GA Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 22**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/GA-Money-Transmitter-Company-Amendment-Checklist.pdf>;

- b. Alaska (15 days). A true and correct copy of a printout of the NMLS's AK Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 23**, and can be accessed at

[https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/AK-Money\\_Transmitter\\_License-Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/AK-Money_Transmitter_License-Company-Amendment-Checklist.pdf);

- c. Maine (15 days). A true and correct copy of a printout of the NMLS's Maine Money Transmitter License Company Amendments Agency Requirements is attached as **Exhibit 24**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/ME-Money-Transmitter-Company-Amendment-Checklist.pdf>;

- d. New York (30 days). A true and correct copy of a printout of the NMLS's NY Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 25**, and can be accessed at

[https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NY\\_Money\\_Transmitter-Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NY_Money_Transmitter-Company-Amendment-Checklist.pdf);

- e. South Carolina (15 days). A true and correct copy of a printout of the NMLS's SC Money Transmitter Amendment Checklist (Company) is attached as **Exhibit 26**, and can be accessed at

[https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/Money\\_Transmitter\\_Company\\_Amendment\\_Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/Money_Transmitter_Company_Amendment_Checklist.pdf);

- f. South Dakota (15 days). A true and correct copy of a printout of the NMLS's SD Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 27**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/SD-Money-Transmitter-License-Amendment-Checklist.pdf>;
- g. Texas (15 days). A true and correct copy of a printout of the NMLS's TX-DOB Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 28**, and can be accessed at [https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/TX-DOB-Money\\_Transmission-Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/TX-DOB-Money_Transmission-Company-Amendment-Checklist.pdf);
- h. Wyoming (15 days). A true and correct copy of a printout of the NMLS's Advance Change Notice Requirements Chart, sorted for (i) Agency "WY", (ii) License Name "Money Transmitter License" and (iii) Legal Name Change, is attached as **Exhibit 29**, and can be accessed at <https://nationwidelicensingsystem.org/slr/common/Pages/AdvanceChangeNotice.aspx> at the "Advance Change Notice Requirements Chart" link;
- i. California (30 days). A true and correct copy of a printout of the NMLS's CA-DFPI Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 30**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/CA-DFPI-Money-Transmitter-License-Company-Amendment-Checklist.pdf>;
- j. Connecticut (30 days). A true and correct copy of a printout of the NMLS's CT Money Transmission License Amendment Checklist (Company) is attached as



**Exhibit 31**, and can be accessed at

[https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/CT\\_Money\\_Transmission\\_License-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/CT_Money_Transmission_License-Amendment-Checklist.pdf);

- k. Delaware (30 days). A true and correct copy of a printout of the NMLS's Advance Change Notice Requirements Chart, sorted for (i) Agency "DE", (ii) License Name "Check Seller, Money Transmitter License" and (iii) Legal Name Change, is attached as **Exhibit 32**, and can be accessed at <https://nationwidelicensingsystem.org/slr/common/Pages/AdvanceChangeNotice.aspx> at the "Advance Change Notice Requirements Chart" link;
- l. Idaho (30 days). A true and correct copy of a printout of the NMLS's Advance Change Notice Requirements Chart, sorted for (i) Agency "ID", (ii) License Name "Money Transmitters" and (iii) Legal Name Change, is attached as **Exhibit 33**, and can be accessed at <https://nationwidelicensingsystem.org/slr/common/Pages/AdvanceChangeNotice.aspx> at the "Advance Change Notice Requirements Chart" link;
- m. Kansas (30 days). 35 A true and correct copy of a printout of the NMLS's Kansas Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 34**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/KS-Money-Transmitter-Company-Amendment-Checklist.pdf>;
- n. Kentucky (30 days). A true and correct copy of a printout of the NMLS's Advance Change Notice Requirements Chart, sorted for (i) Agency "KY", (ii) License Name "Money Transmitter License" and (iii) Legal Name Change, is

attached as **Exhibit 35**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/common/Pages/AdvanceChangeNotice.aspx> at the “Advance Change Notice Requirements Chart” link;

- o. Louisiana (30 days). A true and correct copy of a printout of the NMLS’s Advance Change Notice Requirements Chart, sorted for (i) Agency “LA”, (ii) License Name “Sale of Checks and Money Transmitters” and (iii) Legal Name Change, is attached as **Exhibit 36**, and can be accessed at <https://nationwidelicensingsystem.org/slr/common/Pages/AdvanceChangeNotice.aspx> at the “Advance Change Notice Requirements Chart” link;
- p. Massachusetts (30 days). A true and correct copy of a printout of the NMLS’s MA Foreign Transmittal Agency License Amendment Checklist (Company) is attached as **Exhibit 37**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/MA-FTA-License-Amendment-Checklist.pdf>;
- q. Michigan (30 days). A true and correct copy of a printout of the NMLS’s MI Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 38**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/MI-Money-Transmitter-License-Company-Amendment-Checklist.pdf>;
- r. New Hampshire (30 days). A true and correct copy of a printout of the NMLS’s NH Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 39**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NH-Money-Transmitter-License-Company-Amendment-Checklist.pdf>;

- s. North Carolina (30 days). A true and correct copy of a printout of the NMLS's NC Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 40**, and can be accessed at

[https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NC\\_Money-Transmitter\\_License-Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NC_Money-Transmitter_License-Company-Amendment-Checklist.pdf);

- t. Utah (30 days). A true and correct copy of a printout of the NMLS's UT-DFI Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 41**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/UT-DFI-MONEY-TRANSMITTER-LICENSE-Amendment-Checklist.pdf>;

- u. Virginia (30 days). A true and correct copy of a printout of the NMLS's VA Money Order Seller and Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 42**, and can be accessed at

[https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/VA\\_Money\\_Order\\_Seller\\_and\\_Money\\_Transmitter\\_License--Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/VA_Money_Order_Seller_and_Money_Transmitter_License--Company-Amendment-Checklist.pdf); and

- v. Maryland (60 days). A true and correct copy of a printout of the NMLS's Maryland Money Transmitter License Company Amendments Agency Requirements is attached as **Exhibit 43**, and can be accessed at

<https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/MD-Money-Transmitter-Company-Amendment-Checklist.pdf>.

7. The NMLS website indicates only three states that may require some approval under certain circumstances to change a money transmitter's legal name, as follows:
- a. Hawaii. A true and correct copy of a printout of the NMLS's Hawaii Money Transmitter License Company Amendments Agency Requirements is attached as **Exhibit 44**, and can be accessed at <https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/HI-Money-Transmitter-License-Company-Amendment-Checklist.pdf>. This document states "prior approval from DFI required" for a legal name change;
  - b. New York. A true and correct copy of a printout of the NMLS's NY Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 25**, and can be accessed at [https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NY\\_Money\\_Transmitter-Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/NY_Money_Transmitter-Company-Amendment-Checklist.pdf). This document states that permission must be obtained for a change of legal name if the new name contains any of the following words or any derivatives thereof: acceptance, bank, finance, investment, loan, mortgage, savings, trust, or guarantee; and
  - c. Virginia. A true and correct copy of a printout of the NMLS's VA Money Order Seller and Money Transmitter License Amendment Checklist (Company) is attached as **Exhibit 42**, and can be accessed at [https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/VA\\_Money\\_Order\\_Seller\\_and\\_Money\\_Transmitter\\_License--Company-Amendment-Checklist.pdf](https://nationwidelicensingsystem.org/slr/PublishedStateDocuments/VA_Money_Order_Seller_and_Money_Transmitter_License--Company-Amendment-Checklist.pdf). This document states licensees cannot begin conducting Virginia

business under the new name until the name has been authorized by the Commission.

### **BitLicense Holder**

8. The State of New York's Department of Financial Services ("DFS") reports that Square, Inc. has not changed the legal name on its BitLicense to Block, Inc. As of January 12, 2022 (the last date DFS has indicated the information is updated), Block, Inc. is not listed as a holder of BitLicense, but Square, Inc. is. A true and correct copy of a printout of the New York DFS's website is attached as **Exhibit 45**, and can be accessed at

[https://www.dfs.ny.gov/apps\\_and\\_licensing/virtual\\_currency\\_businesses/regulated\\_entities](https://www.dfs.ny.gov/apps_and_licensing/virtual_currency_businesses/regulated_entities).

9. Square, Inc.'s "Licenses" webpage on its website ([www.squareup.com](http://www.squareup.com)) states that its license for "Money Transmission" and "Virtual Currency" "will remain in the name of 'Square, Inc.' pending approval of the New York Department of Financial Services." A true and correct copy of a printout of Square, Inc.'s "Licenses" webpage from its website is attached as

**Exhibit 46**, and can be accessed at <https://squareup.com/us/en/legal/general/licenses>.

### **Brokerage Services**

10. According to ispot.tv, Block, Inc. is airing a television ad disclaimer on Cash App advertising that states: "Brokerage services provided by Cash App Investing, LLC, member FINRA / SIPC. Cash App does not provide investment advice. Investing has risks: you may lose money. Megan Thee Stallion not affiliated with Cash App Investing LLC. Bitcoin trading offered by Square, Inc. Cash App Investing does not trade bitcoin and Square is not a member of FINRA or SIPC. Square, Inc. is licensed by the New York Department of Financial Services. Cash app is a financial platform, not a bank. Banking services provided and debit cards issued by Cash App's banking partner(s)."). A true and correct copy of a screenshot of the disclaimer

and printout from the ispot.tv website is attached as **Exhibit 47**, and can be accessed at <https://ispot.tv/ad/qCTF/cash-app-message-featuring-megan-thee-stallion>.

#### **Prepaid Account Holder Agreements**

11. A search of the online database maintained on the website of the federal Consumer Financial Protection Bureau (“CFPB”) for “block” shows that there are no prepaid account holder agreements submitted by “Block, Inc.” A true and correct copy of a printout of the CFPB’s website showing the results report from a search for the term “block” is attached as **Exhibit 48**, and can be accessed at [https://www.consumerfinance.gov/data-research/prepaid-accounts/search-agreements/?search\\_field=all&q=block](https://www.consumerfinance.gov/data-research/prepaid-accounts/search-agreements/?search_field=all&q=block) (showing 6 matches for the term “block” within the CFPB’s Prepaid product agreements database, none of which are for Block, Inc.”).

12. A search of the online database maintained on the website of the CFPB for “square” shows that there are no prepaid account holder agreements submitted by “Square, Inc.” A true and correct copy of a printout of the CFPB’s website showing the results report from a search for the term “square” is attached as **Exhibit 49**, and can be accessed at [https://www.consumerfinance.gov/data-research/prepaid-accounts/search-agreements/?search\\_field=all&q=square](https://www.consumerfinance.gov/data-research/prepaid-accounts/search-agreements/?search_field=all&q=square) (showing 12 matches for the term “square” within the CFPB’s Prepaid products agreements database).

13. The Cash App Card application process states that the card is “issued and bank services provided by Sutton Bank, Member FDIC.” A true and correct copy of a screenshot from the Cash App Card application process is attached as **Exhibit 50**.

**Press Coverage Referring to H&R Block as “Block”**

14. A true and correct copy of an article entitled “Block raises more than \$1M for nonprofits,” published by *Accounting Today* on or around May 29, 2018, is attached as **Exhibit 51**, and can be accessed at <https://www.accountingtoday.com/news/h-r-block-raises-more-than-1m-for-nonprofits>.

15. A true and correct copy of an article entitled “Block to offer clients credit scores and analysis,” published by *Accounting Today* on or around March 13, 2018, is attached as **Exhibit 52**, and can be accessed at <https://www.accountingtoday.com/news/h-r-block-to-offer-clients-credit-scores-and-analysis>.

16. A true and correct copy of an article entitled “New Block CEO Jones plans a return to form,” published by the *Kansas City Business Journal* on or around February 16, 2018, is attached as **Exhibit 53**, and can be accessed at <https://www.bizjournals.com/kansascity/news/2018/02/16/hr-block-jeff-jones-marketing-brand-drive-revival.html>.

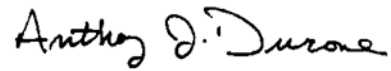
17. A true and correct copy of an article entitled “Block creates virtual office for online community,” published by the *Kansas City Business Journal* on or around March 12, 2007, is attached as **Exhibit 54**, and can be accessed at <https://www.bizjournals.com/kansascity/stories/2007/03/12/daily23.html>.

18. A true and correct copy of an article entitled “Block Switches Its Prepaid Cards to MC,” published by *American Banker* on or around December 20, 2006, is attached as **Exhibit 55**, and can be accessed at <https://www.americanbanker.com/news/block-switches-its-prepaid-cards-to-mc-ab298592>.

19. True and correct copies of 102 additional articles that refer to H&R Block as “Block” in their headlines, as obtained from the LexisNexis News database, are attached as **Exhibit 56**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Kansas City, Missouri on this 21st day of January, 2022.

A handwritten signature in black ink that reads "Anthony J. Durone". The signature is written in a cursive, slightly slanted style.

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Anthony J. Durone